

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE:

	)	
VANWINKLE, DEREK LEE	)	CASE NO. 14-02251-JMC-7
VANWINKLE, STACEY LEIGH	)	
	)	
Debtors.	)	

**APPLICATION TO EMPLOY SPECIAL COUNSEL**

Comes now Paul D. Gresk, the Chapter 7 trustee of this bankruptcy proceeding, and in support of this application makes the following showing:

- 1) Paul D. Gresk is the duly appointed Chapter 7 trustee of this bankruptcy proceeding.
- 2) The Debtors have an interest in two lawsuits.
- 3) The Chapter 7 trustee seeks to employ Clark, Quinn, Moses, Scott & Grahm, LLP and Price, Waicukauski, Joven & Catlin, LLC to represent him in the advancement of the lawsuits. An affidavit of William W. Gooden of Clark, Quinn, Moses, Scott & Grahm, LLP and an affidavit of Ronald J. Waicukauski of Price, Waicukauski, Joven & Catlin, LLC are attached hereto attesting to the firms' lack any conflict of interest.
- 4) For their representation, Clark, Quinn, Moses, Scott & Grahm, LLP and Price, Waicukauski, Joven & Catlin, LLC will seek fees based upon the attached contract.
- 5) To the best of the applicant's knowledge, the law firms of Clark, Quinn, Moses, Scott & Grahm, LLP and Price, Waicukauski, Joven & Catlin, LLC does not have any connections with the Debtors aside from previously representing them in the lawsuits, do not have any connections with the U.S. Trustee, or represent any interest adverse to the Chapter 7 trustee or this estate.

WHEREFORE, Paul D. Gresk, the Chapter 7 trustee of this bankruptcy proceeding, requests the authority to employ the law firms of Clark, Quinn, Moses, Scott & Grahn, LLP and Price, Waicukauski, Joven & Catlin, LLC as special counsel to represent him in all matters to come before this Court as he seeks the advancement of the two lawsuits and for its representation, Clark, Quinn, Moses, Scott & Grahn, LLP and Price, Waicukauski, Joven & Catlin, LLC will seek a fee based upon the attached contract.

Respectfully submitted,

/s/ Paul D. Gresk  
Paul D. Gresk, the Chapter 7 trustee  
150 East 10th Street  
Indianapolis, IN 46204  
Phone: (317)237-7913  
Fax: (317)237-7912  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this pleading has been served upon the below listed party by either electronic mail and/or U.S. mail, postage prepaid on the date upon filing with the United States Bankruptcy Court.

**April Michelle Hall**  
[april@hall-lawoffice.com](mailto:april@hall-lawoffice.com)

**U.S. Trustee**  
[ustpreion10.in.ecf@usdoj.gov](mailto:ustpreion10.in.ecf@usdoj.gov)

/s/ Paul D. Gresk  
Paul D. Gresk